

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

DAINGEAN TECHNOLOGIES LTD.	§	
	§	
	§	
<i>Plaintiff,</i>	§	CIVIL ACTION No. 2:23-cv-000123-JRG-RSP
v.	§	
AT&T CORP., AT&T MOBILITY	§	
LLC, AT&T MOBILITY II LLC, and	§	JURY TRIAL DEMANDED
AT&T SERVICES INC.	§	
	§	
<i>Defendants,</i>	§	
	§	
ERICSSON INC., and NOKIA OF	§	
AMERICA CORPORATIONS	§	
	§	
<i>Intervenors.</i>	§	

UNOPPOSED MOTION TO CHANGE LEAD COUNSEL DESIGNATION

Plaintiff Daingean Technologies Ltd. (“Plaintiff”) hereby requests that the Court change the designation of lead attorney for Plaintiff in the above-styled action. Plaintiff’s proposed new lead attorney, Mr. Amir H. Alavi, is a partner at Plaintiff’s lead firm, Alavi & Anaipakos PLLC, and has played a significant role in managing this case from the beginning, along with Mr. Demetrios Anaipakos, Plaintiff’s designated lead attorney. Mr. Anaipakos has recently reduced his involvement in this case due to commitments that have arisen on other matters, which are likely to continue. In light of Mr. Alavi’s involvement and expected continued management of the case, and Mr. Anaipakos’s expected reduced involvement, Plaintiff requests its lead counsel designation be changed from Mr. Demetrios Anaipakos to Mr. Amir H. Alavi. Because of his involvement and shared case management to date, Mr. Alavi has full knowledge of the case and authority to argue and negotiate on Plaintiff’s behalf in accordance with the requirements in the Court’s Standing

Order Regarding “Meet and Confer” Obligations Relating to Discovery Disputes and as required by Local Rule CV-11(a).

Defendants AT&T Corp., AT&T Mobility LLC, AT&T Mobility II LLC and AT&T Services Inc (“AT&T”) and Intervenors Ericsson Inc. (“Ericsson”) and Nokia of America Corporation (“Nokia”) do not oppose Plaintiff’s requested relief.

Dated: February 2, 2024

Respectfully submitted,

/s/ Amir H. Alavi
Amir H. Alavi
Texas Bar No. 00793239
aalavi@aatriallaw.com
Demetrios Anaipakos
Texas Bar No. 00793258
danaipakos@aatriallaw.com
Michael McBride
Texas Bar No. 24065700
mmcbride@aatriallaw.com
Scott W. Clark
Texas Bar No. 24007003
sclark@aatriallaw.com
ALAVI & ANAIPAKOS PLLC
609 Main Street, Suite 3200
Houston, Texas 77002
Telephone: (713) 751-2362
Facsimile: (713) 751-2341

Michael Heim
Texas Bar No. 09380923
mheim@hpcllp.com
Eric Enger
Texas Bar No. 24045833
eenger@hpcllp.com
R. Allan Bullwinkel
Texas Bar No. 24064327
abullwinkel@hpcllp.com
Alden Harris
Texas Bar No. 24083138
aharris@hpcllp.com
Blaine Larson

Texas Bar No. 24083360
blarson@hpcllp.com
Michael B. Dunbar
Texas Bar No. 24125213
mdunbar@hpcllp.com
HEIM PAYNE & CHORUSH LLP
609 Main Street, Suite 3200
Houston, Texas 77002
Telephone: (713) 221-2000
Facsimile: (713) 221-2021

Andrea L. Fair
Texas Bar No. 24078488
andrea@wsfirm.com
WARD, SMITH & HILL, PLLC
P.O. Box 1231
Longview, Texas 75606
Telephone: (903) 757-6400
Facsimile: (903) 757-2323

*Counsel for Plaintiff Daingean Technologies
Ltd.*

CERTIFICATE OF SERVICE

Pursuant to the Federal Rules of Civil Procedure and Local Rule CV-5, I hereby certify that, on February 2, 2024, a copy of the foregoing was served electronically through the U.S. District Court, Eastern District of Texas ECF system to all counsel of record whom are Filing Users of the Court's Electronic Filing System.

/s/ Amir H. Alavi _____
Amir H. Alavi

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is unopposed.

/s/ Amir H. Alavi _____
Amir H. Alavi